

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Criminal No. 13-42 DWF/JSM

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. IRINEO SERIO MORENO,
2. RYAN TIMOTHY SOLON,
3. CHRISTOPHER DAVID,
SCHUMACHER,
4. SHAWN ANDREW WITHROW,
5. JEREMY ALLEN ANDERSON,
6. COREY WILLIAM JOHNS,
7. ARTHUR EUGENE JOHNS, and
8. MATTHEW RYAN WASTE,

INDICTMENT

21 U.S.C. § 841(a)(1), (b)(1)(A) and 846

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute Marijuana)

From in or about January 2009 and continuing through on or about December 20,
2012, in the State and District of Minnesota and elsewhere, the defendants,

IRINEO SERIO MORENO,
RYAN TIMOTHY SOLON,
CHRISTOPHER DAVID SCHUMACHER,
SHAWN ANDREW WITHROW,
JEREMY ALLEN ANDERSON,
COREY WILLIAM JOHNS,
ARTHUR EUGENE JOHNS, and
MATTHEW RYAN WASTE,

SCANNED

MAR 04 2013

U.S. DISTRICT COURT ST. PAUL

FILED MAR 04 2013
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD _____
DEPUTY CLERK _____

did unlawfully, knowingly and intentionally conspire with each other and with other persons known and unknown to the Grand Jury, to distribute 1,000 kilograms or more of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

FORFEITURE ALLEGATIONS

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853(a).

If convicted of Count 1 of the Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any and all property constituting or derived from any proceeds the defendants obtained, directly or indirectly as a result of said violation, and any and all property used or intended to be used in any manner or part to commit or facilitate the commission of such violation, including but not limited to the following:

- a. Property Identification Number 210-143-04 legally described as T 1S R 5E Sec 1, Humboldt County, California;
- b. 1999 Chevrolet Tahoe K1500, VIN 3GNEK18R0XG193501;
- c. 2006 Toyota Tacoma Pickup, VIN 5TEJU62N96Z205376;
- d. 2003 Ford F150 Lightning Pickup, VIN 2FTRF07383CB00236;
- e. 2001 Ford F150 Lightning Pickup, VIN 2FTZF073X1CA60948;
- f. 2012 Harley-Davidson FLHTK Electra Touring,
VIN 1HD1KEM18CB655285;
- g. 2007 Honda CBR600 Motorcycle, VIN JH2PC40027M012500;
- h. 2010 Kawasaki JS800 Jet Ski, VIN USKAW10853C010;
- i. 2008 Kawasaki JT1500 Jet Ski, VIN KAW46728D808;
- j. 2008 Sea Doo RXT215 Jet Ski, VIN YDV58655D808;
- k. 2008 Sea Doo RXT215 Jet Ski, VIN YDV57509D808;
- l. 2010 Triton Double PWC Trailer, VIN 4TCSM1121AHL32960;
- m. 2009 Shorelander Double PWC Trailer, VIN 1MDKNKM109A437399;

- n. \$5,011.00 U.S. Currency;
- o. \$5,000.00 U.S. Currency;
- p. \$11,700.00 U.S. Currency;
- q. 2000 BMW 328i Sedan, VIN WBAAM5349YKG18695;
- r. 2000 BMW 323i Sedan, VIN WBAAM3343YFP77562;
- s. 2005 Toyota 4 Runner, VIN JTEBT17RX58028368;
- t. \$6,900.00 U.S. Currency;
- u. 2008 Mercedes-Benz CLS 550 Sedan, VIN WDDDJ72X48A131574;
- v. 2006 Chevrolet Colorado Truck, VIN 1GCDT136068283251; and
- w. \$4,700.00 U.S. Currency.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON